BEFORE THE PUBLIC DISCLOSURE COMMISSION OF THE STATE OF WASHINGTON

IN THE MATTER OF ENFORCEMENT ACTION AGAINST

JEFFERSON COUNTY REPUBLICAN CENTRAL COMMITTEE

Respondent

PDC CASE NO. 04-288

RESPONDENT'S WITNESS LIST AND EXHIBIT LIST

COMES NOW the Respondent, Jefferson County Republican Central Committee, and submits the following documents:

- 1. Respondent's Witness List, Exhibit A.
- 2. Respondent's Exhibit List, Exhibit B.

Dated this 15 day of October, 2004.

John J. White, Jr., WSBA No. 13682

James E. Hurt, WSBA No. 1500 LIVENGOOD, FITZGERALD

& ALSKOG, PLLC

Attorneys for Jefferson County Republican Central Committee

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RESPONDENT'S OPENING BRIEF, WITNESS LIST AND EXHIBIT LIST - 1

The following witnesses may be called by Respondent at the adjudicative proceeding on

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Mark Rose (by telephone) 3. Ron Gregory (by telephone)

Sally Parker

October 26, 2004:

1.

2.

- 4. Noel Greenwood (by telephone)
- 5. Bryn Armstrong (by telephone)
- In addition, Respondent reserves the right to call whatever rebuttal witnesses are necessary to counter testimony of the Public Disclosure Commission and reserves the right to call any of the Public Disclosure witnesses listed and to fully cross-examine any witnesses called by the Public Disclosure Commission.

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The following exhibits may be utilized by Respondent at the adjudicative proceeding on October 26, 2004:

- 1. The "Pinocchio Rose" video at issue in this proceeding (to be provided at hearing).
- 2. Letter from Susan Marett to Sally Parker dated May 18, 2004 together with the mailer from Mark Rose attached to that letter.
- 3. Facsimile from Sally Parker to Sarah Streiff at LA Times dated March 2, 2004, authenticating employment together with response from Sarah Streiff dated March 3, 2004, and confirming letter dated July 7, 2004 from Sarah Bedinghaus HR Coordinator II of Los Angeles Times to Sally Parker.
- 4. Notes to file of Sally Parker concerning telephone conversations in the investigation of this matter, dated April 30, 2004.
- 5. Letter of January 14, 2004 from Ron Gregory to Phillip Stutzman attaching letter from Noel Greenwood dated October 17, 2003.
- 6. Letter dated October 23, 2003 from Susan Marett to Phil Stutzman together with copy of the article from Port Townsend Leader dated October 22, 2003.
- 7. Memorandum dated October 31, 2003 to Phil Stutzman from Ron Gregory concerning allegation of email publication of Pinocchio ad.

S:\UJW\jeffERSON COUNTY - PDC\Brief.WtnList.ExhList.doc

"PINOCCHIO ROSE" VIDEO

[TO BE PROVIDED AT HEARING]

EXHIBIT 1

May 18, 2004

RECEIVED

Sally:

MAY 1 9 2004

Enclosed is the only mailer that mentions Mark Rose's past employment as a journalist.

The reason this became an issue is that Bryn Armstrong thought he could get the "goods" on Mark by checking with his sources at the LA Times. It turns out his sources were unable to access the personnel records far enough back to pick up Mark's employment.

The Republicans were looking for whatever they could find that could discredit Mark's character and they thought they had found it in his work with the LA Times.

The rest of our mailers and ads, spoke of the issues facing Jefferson County.

It seems to me that the question of what sparked this attack should be asked of the Republicans who launched the attack rather than the Mark Rose campaign.

Susan Marett

Campaign Manager for Mark Rose for County Commissioner

Maul

360-385-0390

marett@cablespeed.com

ROSE

County Commissioner • Dist. 3 (D)



"I promise to listen and act in the best interests of the people of Jefferson County. I support a strong, diversified economy, creating jobs that are compatible with our communities while preserving our natural environment. I will work with people to find common ground and to achieve significant results."

- Mark Rose

- Results Oriented
- Problem Solver
- Team Player

Murk Rose

COUNTY COMMISSIONER, DISTRICT 3 (D)

Community Record

- Current president, CommTech, Inc., providing local employment
- Publisher, *OlympicTechNet.com*, tech resource for the Olympic Peninsula region
- Founder, Guy Rudolph Planning Research Center, Jefferson County Historical Society
- Member, North Olympic Peninsula Resource, Conservation & Development Council, facilitating community development projects in Jefferson County

Background

- Extended family ties to South Jefferson County
- Twenty years business background; journalist with the *New York Times* and *LA Times*
- Seven years Hotshot & Helitac forest firefighting, US Forest Service, Washington

I am Committed to:

Open & Responsive Government

 Bringing people together to make the decisions that affect their communities

Diversified Economy

• Fostering a business-friendly environment that works for all of us

Preservation

Protection of our natural resources and local character



Paid for by Comm. To Elect Mark Rose County Commissioner 504 "V" St., Port Townsend, WA 98368 • 360/796-3300 www.markrose.org • mark@markrose.org



Sally Parker

om:

Mark Rose [mark@markrose.org]

Sent:

Wednesday, May 19, 2004 10:10 AM

To:

Sally Parker

Cc:

Bill Biery: Sue Marett

Subject: JeffCo Republican Investigation

Ms. Parker:

I received your voice mail message today. Sue Marett, my campaign manager, sent my "slim jim" to you. It mentions my experience as a journalist. Please direct any inquiries to Bill Biery, who filed the complaint, or Sue Marett. I have spent dozens of hours proving my background and I am finished.

Mailings went out during the campaign that accused me of extortion, embezzlement and being a drug addict. I supposedly bounced checks to local merchants, lived with my in-laws (?) and filed multiple lawsuits against everybody in town. Ms. Armstrong wrote nasty letters to every publication in the region accusing me of lying about everything except being a human being. The ad they ran on TV was one of the less offensive methods of character assassination.

I am having a hard time understanding why this is taking six months to finalize. I was an employee of the Los Angeles Times and I never wrote a letter to the editor. It has been proven from multiple sources.

Why on earth would anybody run for public office when they can't even expect the PDC to see through this flack?

Mark Rose



State of Washington C DISCLOSURE COMMISSION

711 Capitol Way Rm. 206, PO Box 40908 • Olympia, Washington 98504-0908 • (560) 753-1111 • FAX (360) 753-1112
Toll Free 1-877-601-2828 • E-mail: pdc@pdc.wa.gov • Website: www.pdc.wa.gov

FACSIMILE COVER SHEET

DATE: $3/2/0$	4	TIME SENT: _4:00]	PM
TO: Sara	h Streiff, LA Times Personnel	FAX NO: _213-2	37-2350
FROM: Sally	Parker July Hulin	PHONE NO: _360-5	86-2869
RE: Mark R	ose Employment Verification	-	
PAGES:	1	•	
Dear Sarah,			
As per our telep	hone conversation, please prov	ide me with written verifi	cation of Mark
Rose's employment with the LA Times. Please provide the following:			
Dates of employment: from 4/26/82 to 12/6/82			
Position:	opy Messenge	Y	 .
I certify (or decl	are) under penalty of perjury t	ınder the laws of the State	of Washington
I certify (or declare) under penalty of perjury under the laws of the State of Washington that the facts set forth are, to the best of my knowledge true and correct.			
Your Signature: January Freel			
Position: <u>HR</u>	Coordinator	Date:	3/3/04

JUI 7 200

Ios Angeles Times

202 West First Street Los Angeles, CA 90012 213 237-5000

RECEIVED

JUL 1 2 2004

Public Disclosure Commiss

Sally Parker State of Washington Public Disclosure Commission 711 Capitol Way Rm. 206 P.O. Box 40908 Olympia, WA 98504-0908

July 7, 2004

We received a request from Sally Parker for a matter regarding Mark Rose, Social Security Number on July 6, 2004 requesting that I testify via phone in the matter to authenticate any and all employment records for Mr. Rose. Mr. Rose's employment with the Los Angeles Times ranged from 4/26/82 through 12/6/82 as a Copy Messenger. We have met record retention requirements of seven (7) years and do not have any additional employment information on Mr. Rose.

We ask the court to assist us in this matter by accepting our request to waive appearance. If an appearance is necessary, I will only be able to testify to the same.

We hope that the parties will be able to resolve their differences regarding this matter without further involvement by the Los Angeles Times. However if an appearance is required, we will require a subpoena. Please contact me directly at (213) 237-3223 if you have any additional questions.

Bedinghie

Sincerely,

Sarah Bedinghaus HR Coordinator II

420 Al Sarah Street - World Whe DOB n 425 Rossos DOB 9/29/52 4251 Sarah - gave DOB 4300 hereived Offax from Small 1 Aarals - what is copy messenger articles with his Wyline would have happened in a vigoral volo-but Copy Mossenger 435 Meather Woodward - Olympian lides in sing copy golder - occar sees bread & wither mew then the copy desk-read stonies & design p 445 Peret Wrimley Newth P1 206-448-8316 Chies Beringer " never heard of messenger

Jefferson County Republican CENTRAL COMMITTEE



Less Government • People First

RECEIVED

JAN 2 0 2004

Public Disclosure Commission

January 14, 2004

Mr. Philip E. Stutzman
Public Disclosure Commission
PO Box 40908
Olympia. Washington 98504-0908

Dear Sir,

I thought this matter was behind us. It appears that Susan Marett is blaming the Jefferson County Republican Party for the voters in Jefferson County who soundly rejected the candidacy of Mark Rose for County Commissioner. This complaint is sour grapes and should be viewed as such.

Enclosed you will find a fax copy from Mr. Noel Greenwood regarding the public claims of Mr. Rose regarding his journalistic "career". This is the information we used in questioning Mr. Rose's journalistic credentials.

Sincerely

Ron Gregory, Chair

Jefferson County Republican Central Committee

Noel Greenwood BOOK DEVELOPMENT AND EDITING

RECEIVED

JAN 2 0 2004

Public Disclosure Commission

October 17, 2003

Via Fax

Mr. Bryn Armstrong Port Townsend, Washington

Dear Mr. Armstrong:

You have asked me if a Mark Rose was at any time a journalist on the editorial staff of the Los Angeles Times. You forwarded for my examination a list of articles from the Times that Mr. Rose has offered as evidence to support that claim. The articles are from the early 1980s. In addition, you forwarded various printed material, including a campaign pamphlet and newspaper clippings, in which Mr. Rose asserts that he was a journalist at the Times or is described as such.

I was an editor for 18 years at the Times, from assistant metropolitan editor in 1974 to deputy managing editor in 1983 and senior editor in 1990. I retired in 1992. During the time period indicated by the Mark Rose list of articles, I was metropolitan editor. As such, I supervised the metropolitan staff, four state bureaus, several suburban sections within Los Angeles County and daily editions in San Diego and Orange County.

I have no recollection of anyone named Mark Rose on the editorial staff of the Los Angeles Times during my tenure as an editor, nor do several other editors with whom I have consulted. A search by the Times library thus far has turned up no articles that indicate he was a member of the editorial staff.

De come los 1600 - Salug Berton Ca 131/1014039 205 969-2575 77 X 805 505 3007

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that are typically don't have that most if not all are the by the article. You ill note that most if not all are the by the article. You ill note that most if not all are the by written for the Boo Review, Travel and View sec' ins, which rely heavily on free-lance contributors.

Free-lance contributors are not employees of the Times. They are not entitled to claim that they are "journalists with" the Times, nor are they entitled to claim that they are "on the staff of the Los Angeles Times" or "a member of the editorial staff." Only full-time regularly employed writers and editors may claim that status.

The only claim that free-lance contributors can make is that they are free-lance contributors, or "stringers" in the journalistic vernacular.

A search of employee personnel records has not yet been completed. If Mr. Rose was employed in a lesser position, say as a copy messenger or clerk in an editorial office, that would entitle him to claim that he was an editorial department employee. But it would not entitle him to claim that he was a journalist at the Times or a member of the editorial staff. The distinction is quite important.

Sincerely,

WoM Commen

October 23, 2003

OCT 2 3 2003

RECEIVED

OCT 2 4 2003

Public Disclosure Commissio

Mr. Phil Stutzman
Director of Compliance
Public Disclosure Commission
P.O. Box 40908
Olympia, WA 98540-0908

Subject: Complaint #04-288

Dear Mr. Stutzman:

This letter is in reference to the complaint filed on October 17, 2003, by William Biery against the Jefferson County Republican Central Committee re television ad against Mark Rose, County Commissioner candidate.

Please find enclosed a copy of the Port Townsend Leader article dated October 22, 2003, stating that Barney Burke of the PT Leader contacted a spokesperson at the LA Times and received confirmation of Mark Rose's employment there in 1982.

If you wish to speak to Barney to verify his statement, he can be reached at 360-385-2900 or bburke@ptleader.com.

I reiterate, the Jefferson County Republicans were made aware of Mark's employment at the LA Times in August, 2003, as shown in the previous clipping I sent you dated August 23, 2003. Yet, they persisted in preparing and airing the TV ad in question.

Thank you for your attention to this serious matter.

Susan Marett, campaign manager for Mark Rose for County Commissioner

92 N. Rhododendron Dr.

Port Townsend, WA 98368

Luxan Manett

360-385-0390

marett@cablespeed.com

epublicans step up questioning of kose

Patrick J. Sullivan Leader Staff Writers

emocratic county commis- , ges made by some critics a a paid advertisement on he Jefferson County Reican Party is amplifying

mittee, chaired by Ron lican Party Central cable TV that began runjory, charges that Rose has about his employment hishis education and his filast week, the local Reer candidate Mark Rose. ial success.

"doesn't tell half of what it stand it, there's nothing in the

Rose said, "I'm flattered that they would go to the

ad that isn't accurate.

Rodgers said that the ad should," adding, "As I under-

lutely."

ose's opponent, Republi-Pat Rodgers, said of the ad week, "I don't condone it ch was the central I don't knock it." He said not screen the ad idea,

Three key charges in the ad

but they refused.

are that Rose lied about working for the L.A. Times newspa-

> regory said yesterday, "I not had one phone call eisupporting or condemnmittee's creation.

which have also been raised in other newsprint or brochure campaign ads and raised at question-and-answer candidate

Glen Cove talk
Candidates offer ideas;
see page C 3

L.A. Times records ing" the ad. Asked if it was accurate, Gregory replied, "Abso-

employee and that he only wrote that Rose was not an L.A. Times The Republican TV ad stated a "letter to the editor."

reelance writer; the New York

Leader were opinion or first-per-

ournalist. His New York Times experience was that of a Times clips Rose provided to the son accounts. He also had other articles published as a freelancer

> According to an official with The company's personnel files go back only seven years, so no ployee of that company from ment were available. But the pokesperson confirmed that Rose indeed is listed as a former ment, Mark Rose was an em-April 26, 1982 to Dec. 6, 1982. the L.A. Times Personnel Departfurther details of Rose's employ.

> > ing ala Pinocchio. He said he

trouble" to make the ad, which depicts Rose with a nose growasked the GOP to pull the ad,

in other New York newspapers in 983 and 1991, according to In interviews with the Leader.

clips he provided the Leader,

"I can confirm the 1982 date," the spokesperson said Monday afternoon.

> per, lied about his college education, and that he isn't a

successful business person. Rose denies all three charges,

In a voter guide published in

Education

the Aug. 31 edition of the Penin-

swered "BBA, MBA, Pacific mary candidates Bob "Cougar" did not try to misrepresent his education to the Daily News. In Garten listed his education as sula Daily News, Rose lists his Rose holds only a high school that same publication, fellow priformal education as "New York University, new media and public relations." As has been previously reported by the Leader, "Grade 12" and Rodgers an Lutheran University." ted for Leader review a file of "editorial" employee. It also ished a travel piece by Rose on Oct. 24, 1982, regarding his In August, Rose had submitnewspaper clips, some original a book review published in ence that Rose was a Times experiences living in New York and some photocopies, that included about six pieces from an obituary, a travel piece and 982. Two of those items included an ending tagline referappears the L.A. Times pubthe L.A. Times. This included

Rose said this week that he

ture, Rose describes himself as having been a "journalist with the Republicans have questioned New York Times and L.A. Times." whether Rose can call himself In a piece of campaign liter

tax debt, more than \$3,000, as required in financial disclosures he filed with the Washington Public Disclosure Commission in August. Rose has listed no fiabout his finances in the Aug. 20 nancial assets other than his home. Rose answered questions edition of the Leader.

Rose's involvement with a failed bourke@pileader.com.) ousiness career," Rose said yeserday, contending that those "I believe I have a successful kills would serve him well as an Aug. 27 edition documented elected official. The Leader's

CommTech bz, a marketing and public felanons find, has terresented the Callism County Pub-Whitney Gardens. Rose said this campaigning, and it is producing ic Utility District and Brinnon's business has been mactive dur ing the two months he has beer dot-com business in California notincome strik blief June 144

'The official'inancial statements for all candidates can be "(Contact Barney Burke at found at www.pdc.wa.gov.

Patheting H. Mart

ballots returned so far One-fifth of absentee

Rose never claimed to have been an employee of the New York With the addition of nearly Office has received 18 percent the Jefferson County Auditor's 900 ballots received Tuesday, of the absentee and vote-by mail ballots issued Karen Cartmel said the election. The office tallied 889 ballots for the Nov. 4 general more ballots Tuesday, eight auditor's office mailed 11,477

Leader Stat/Writer

with the Washington Public Disclosure "11" Commission According to reports filed (PDC), Sokol has raised \$6,800.28 and spent \$6,176.68,

can't be counted without a sigof "Which" were 'unsigned so those voters will receive let ters'telling them their vot nature.

of ballots was slightly higher than the percentage that had been returned at the same time "Cartmel' said' 2,044 ballots Blections Coordinator had been fetumed as of Tues day morning. The percentage

Spending on port race Sokol leads Wojt in

Fownsend Commissioner Bob. Richard Wojt, in the raising and Sokol is feading his challenger, spending of campaign funds. son, noting that he owes back -

income taxes in California. Rose

The Republican ad questions

Business success?

Rose's success as a business per-

made a public disclosure of that

Full Juice Bar

1000131

The two reports are as of available at the PDC website Ancumbent Port of Port Indicates a Unbility or deb of \$3,000, his net balance. S"More information -\$2,376.40. Wolf tins 3 post cash balance of \$2,381.92. and spent \$2,583.08.

(Confact Barney Burke bburke@pileader.com.) www.pdc.wa.gov.vinun

ישטער, מרונים ביידריים מייום איים שייום Freshest, Sweetest Pressed Juices

Jefferson County Republican CENTRAL COMMITTEE



Less Government • People First

RECEIVED

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040 CHARTER HOLD - Salm Franch CA 1231 4014029 205 969-2575 TAX 805 585 3067

sees ero the kind

by the article. You ill note that most if not all all the by the article. You ill note that most if not all all the by written for the Boo Review, Travel and View sections, which rely heavily on free-lance contributors.

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